

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA**

RENEE ZINSKY,
Plaintiff,

vs.

MICHAEL RUSSIN, RUSSIN FINANCIAL,
RUSSIN GROUP, SIMON ARIAS, III,
ARIAS AGENCIES, S.A. HOLDING
AMERICAN INCOME
LIFE INSURANCE COMPANY,

Civil Action
No.2:22-cv-547

ELECTRONICALLY FILED

Defendants.

JURY TRIAL DEMANDED

**Plaintiff's Motion for Leave to File Plaintiff's Supplemental Briefs in Support of Motion for
Contempt**

Plaintiff, Renee Zinsky (“Plaintiff”), by and through her undersigned counsel, files this Motion for Leave to File Plaintiff’s Supplemental Brief in Support of Motion for Contempt and Second Supplemental Brief in Support of Motion for Contempt and avers as follows:

I. INTRODUCTION AND PROCEDURAL HISTORY

1. This is a civil action brought by Plaintiff requesting relief for sexual assault, battery, false imprisonment, intentional infliction of emotional distress, defamation, and intrusion upon seclusion as to Defendant, Michael Russin (“Russin”).

2. On April 22, 2023, Plaintiff filed a Motion for Contempt against Defendant Russin in light of Defendant Russin’s ongoing threats and intimidation tactics directed toward Plaintiff, Plaintiff’s counsel, and at least three of Plaintiff’s key witnesses in this case. [Doc. No. 68.]

3. Due to the frequent, ongoing, and constant nature of Defendant Russin’s misconduct, Plaintiff was not able to file her Brief in Support of Motion for Contempt as to Defendant Russin until May 4, 2023. See Plaintiff’s Brief in Support of Motion for Contempt as

to Defendant Russin [Doc. No. 71.] As noted therein, supporting evidence of Defendant's threatening and violent conduct occurred as recently as the same day of filing, i.e. May 4, 2023. Id. at p. 7, footnote 26 [Doc. No. 49.]

4. On May 4, 2023, this Honorable Court denied Defendant Russin's Motion to Strike Plaintiff's Brief in Support of Motion for Contempt. [Text Order, Doc. No. 75].

5. Unbelievably, Defendant Russin has continued to employ threats of violence and intimidation tactics directed toward Plaintiff on a daily basis. See Plaintiff's Supplemental Brief in Support of Motion for Contempt and Plaintiff's Second Supplemental Brief in Support of Motion for Contempt. [Doc. Nos. 80, 81.]

6. Moreover, additional third-party witnesses have come forward attesting to Defendant Russin's use of violence, threats, and intimidation tactics. *See* Plaintiff's Second Supplemental Brief in Support of Motion for Contempt at ¶10. [Doc. No. 81.]

7. Plaintiff respectfully moves the Court for leave to file the Supplemental Brief in Support of Plaintiff's Motion for Contempt and Second Brief in Support of Plaintiff's Motion for Contempt in this matter to capture the ongoing dangerous and grave nature of Defendant Russin's conduct in this matter.

8. To date, Plaintiff has taken every possible step to avoid escalating the litigation, including but not limited to broaching settlement negotiations and refraining from asserting additional civil causes action and/or criminal charges against Russin.

9. For example, Plaintiff was hopeful that this Honorable Court's clear and direct instructions to Russin's counsel on or about September 1, 2022 would resolve Russin's ongoing intimidating and harassing conduct intended to damage Plaintiff's reputation, intrude upon her seclusion, and general safety and welfare.

10. At every turn, Defendants' have only responded to Plaintiff with ongoing deceptive, misleading, concealing, threatening, and/or dilatory conduct¹.

11. Given the fact that the gravity of this matter only continues to escalate while Defendants' sit on their hands, Plaintiff is requesting this Honorable Court to enter the attached order granting Plaintiff leave to file Supplemental Brief in Support of Motion for Contempt and Second Supplemental Brief in Support of Motion for Contempt.

12. Allowing Plaintiff to file the supplemental briefs would serve justice and promote judicial efficiency. Further, there would be no substantial or undue prejudice, bad faith, undue delay, or futility.

13. For all these reasons, Plaintiff respectfully requests that the Court grant Plaintiff's Motion for Leave to file the Supplemental Brief in Support of Plaintiff's Motion for Contempt and Second Brief in Support of Plaintiff's Motion for Contempt.

Date: May 19, 2023

Respectfully submitted,

/s/ Amy N. Williamson

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¹ Unbelievably, Defendants' have yet to respond to Plaintiff's settlement demand. Pursuant to this Honorable Court's instruction on September 1, 2022, Plaintiff relayed her settlement demand (again) to Defendants on September 6, 2022. To date, none of the Defendants have responded to same.